

# Exhibit 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONNA WOOD, individually and on behalf all  
others similarly situated, et al.,

Plaintiff,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

No. 20-cv-02489-LTS-GWG

**DECLARATION OF JAMES KYLE NEWMAN**

I, James Kyle Newman, declare, based on personal knowledge and under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I worked for Mike Bloomberg 2020, Inc. (the “Campaign”) as a Field Organizer from about January 13, 2020 to March 20, 2020.
2. I worked out of the Winston-Salem, North Carolina Campaign office.
3. The Campaign advertised that the Field Organizer position would continue until the November 2020 Presidential Election, regardless of whether Michael Bloomberg remained in the race.
4. When I interviewed three times for the Field Organizer job, I interviewed with Tom Orabuena [Regional Organizing Director] who told me that, if I was hired, the Campaign guaranteed that I would continue to receive my salary and benefits through November, even if Michael Bloomberg was no longer a candidate for office.
5. Multiple times throughout my employment both during training with Robin Brindel [the Field Director] and thereafter, the Campaign represented that it would continue to pay my salary and benefits through November, as well as the salary and benefits of the other

Field Organizers. I relied on these promises in taking the job. I needed a job with secure health benefits due to an accident I had in October. I turned down another opportunity to work for NC Votes because of Defendant's promise to provide pay and benefits through November 2020.

6. Nevertheless, the Campaign terminated my employment on March 20, 2020 and terminated my salary on April 7, 2020, and terminated my benefits as of April 30, 2020.

7. My typical schedule was working seven days a week. I usually worked from 10 a.m. to 8 p.m. on Mondays through Thursdays, 9 a.m. to 6 p.m. on Fridays, 9 a.m. to 9 p.m. on Saturdays, and 12 p.m. to 9 p.m. on Sundays. On some Sundays, we started work at 9 a.m.

8. I usually worked about 70 to 75 hours per week. I was never paid any overtime wages when I worked more than 40 hours in a week.

9. My main job duties as a Field Organizer were to call prospective voters to promote Michael Bloomberg's candidacy for President and to recruit volunteers for phone banking and canvassing efforts. The Campaign required that I meet certain metrics for the number of calls I made, which were many per week. I also met with voters and went door-to-door to encourage voters to vote for Michael Bloomberg.

10. All Field Organizers I observed performed these same duties, which the Campaign headquarters dictated.

11. As a Field Organizer, I had no authority to set other employees' schedules or my own, to direct the work of other employees or my own, or to hire, fire, or discipline other employees. All important decisions were made by a Regional Organizing Director, a state director, or by officials in the Campaign's national headquarters in New York, NY.

12. I also had no authority to make decisions of significance regarding the operations of the Campaign or my field office. I performed the job duties assigned by my Regional

Organizing Director and Campaign, including calling the potential voters, canvassing neighborhoods, and/or visiting addresses assigned to me each day by the Regional Organizing Director.

13. My job duties did not require any specialized education, training, or experience. After I was hired, I attended an orientation at which I learned about the basic job responsibilities.

14. I used a script from the Campaign when making voter phone calls or speaking to voters in person.

15. I frequently received emails from officials in the Campaign's New York headquarters.

16. I also attended weekly conference calls with Campaign staffers across the country during which officials in the Campaign's New York headquarters, who led the calls, provided updates and directives.

17. The Campaign's New York headquarters also required me and other Field Organizers to participate in additional conference calls with Campaign staffers across the country. During these calls, Campaign officials in the New York headquarters provided information and guidance, including talking points for explaining the campaign's policy proposals to voters.

18. My monthly salary was \$6,000.

19. I also participated in the Campaign's health plan.

20. The Campaign did not pay me any overtime compensation for the hours I worked in excess of 40 in a workweek or 8 in a day.

21. I also know that other Field Organizers worked many overtime hours each week without receiving overtime pay. I know this because I worked with other Field Organizers in my office and witnessed them work unpaid overtime wages.

Dated: 3/31/2020

DocuSigned by:  
  
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By: James Kyle Newman